

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN RE: DEALER MANAGEMENT SYSTEMS
ANTITRUST LITIGATION

This Document Relates to All Cases

MDL No. 2817
Case No. 18 C 864

Hon. Robert M. Dow, Jr.
Magistrate Judge Jeffrey T. Gilbert

**STIPULATION AND [PROPOSED] ORDER RE: BRIEFING SCHEDULE
RELATED TO REYNOLDS' MOTION FOR PARTIAL RECONSIDERATION OF
[DKT. 441] ORDER ON MDL PLAINTIFFS' OMNIBUS MOTION TO COMPEL**

Pursuant to Local Rule 78.3, The Dealership Class Plaintiffs ("Dealership Plaintiffs"), Vendor Class Plaintiff Loop, LLC, d/b/a AutoLoop ("AutoLoop"), Plaintiff Cox Automotive, Inc. ("Cox Automotive"), Plaintiff Authenticom, Inc. ("Authenticom"), Plaintiff Motor Vehicle Software Corp. ("MVSC"), and Defendant The Reynolds and Reynolds Company ("Reynolds") (collectively, the "Parties"), by and through their undersigned counsel, jointly submit this Stipulation and proposed Order regarding the briefing schedule applicable to Reynolds' Motion for Partial Reconsideration of (Dkt. 441) Order on MDL Plaintiffs' Omnibus Motion to Compel ("Motion for Reconsideration").

WHEREAS, on November 19, 2018, the Court entered an Order (Dkt. 441) regarding MDL Plaintiffs' Omnibus Motion to Compel (Dkt. 316).

WHEREAS, on December 3, 2018, Reynolds filed its Motion for Reconsideration and noticed it for presentment before the Court on December 13, 2018 at 9:15 a.m. *See* Dkts. 456, 457.

WHEREAS, the above-named parties have met and conferred and have reached the following Stipulation with regard to a briefing schedule related to the Motion for Reconsideration, subject to approval by the Court.

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between the above-named Parties that:

1. MDL Plaintiffs' Response to Reynolds' Motion for Reconsideration is to be filed no later than December 12, 2018.
2. Reynolds' Reply in Support of the Motion for Reconsideration is to be filed no later than December 19, 2018.

STIPULATED AND AGREED:

Dated: December 11, 2018

/s/ Peggy J. Wedgworth

Peggy J. Wedgworth
Elizabeth McKenna
MILBERG TADLER PHILLIPS
GROSSMAN LLP
One Pennsylvania Plaza, 19th Floor
New York, NY 10119
(212) 594-5300
pwedgworth@milberg.com
emckenna@milberg.com

*Dealership Interim Lead Class
Counsel*

/s/ Derek T. Ho

Derek T. Ho
Michael N. Nemelka
KELLOGG, HANSEN, TODD,
FIGEL & FREDERICK, PLLC
1615 M Street, N.W., Suite 400
Washington, D.C. 20036
dho@kellogghansen.com
mnemelka@kellogghansen.com

*Counsel for Plaintiffs Authenticom, Inc.; Cox
Automotive, Inc.; Loop, LLC, d/b/a AutoLoop
on behalf of itself and all others similarly
situated; and Motor Vehicle Software Corp.*

/s/ Brian T. Ross

Brian T. Ross
Gibbs & Bruns LLP
1100 Louisiana, Suite 5300
Houston, TX 77002
bross@gibbsbruns.com

*Counsel for Defendant The Reynolds and
Reynolds Company*

SO ORDERED:

Magistrate Judge Jeffrey T. Gilbert

CERTIFICATE OF SERVICE

I, Derek T. Ho, an attorney, hereby certify that on December 11, 2018, I caused a true and correct copy of the foregoing **STIPULATION AND [PROPOSED] ORDER RE: BRIEFING SCHEDULE RELATED TO REYNOLDS' MOTION FOR PARTIAL RECONSIDERATION OF [DKT. 441] ORDER ON MDL PLAINTIFFS' OMNIBUS MOTION TO COMPEL** to be filed and served electronically via the court's CM/ECF system. Notice of this filing will be sent by e-mail to all parties by operation of the court's electronic filing system or by email to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the court's CM/ECF system.

/s/ Derek T. Ho

Derek T. Ho

KELLOGG, HANSEN, TODD,

FIGEL & FREDERICK, P.L.L.C.

1615 M Street, NW, Suite 400

Washington, D.C. 20036

(202) 326-7900

dho@kellogghansen.com